

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

*In re Sovos Compliance Data Security Incident
Litigation*

Case No. 1:23-cv-12100 (“Master Docket”)

**PLAINTIFFS’ UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs, pursuant to Fed. R. Civ. P. 23(e)(1), submit this Unopposed Motion for Preliminary Approval of Class Action Settlement, and respectfully request the Court enter an order to:

(1) preliminarily approve the Settlement¹ entered into with Defendant Sovos Compliance, LLC, finding the Court is likely to approve the Settlement as fair, reasonable, and adequate pursuant to Fed. R. Civ. P. 23(e)(2);

(2) conditionally certify the Settlement Class;

(3) appoint Plaintiffs Sergei Stadnik, Julianne Yenca, James Lawler, and Tony Anderson as Class Representatives;

(4) appoint Mason Barney and Tyler Bean of Siri & Glimstad LLP and Jeff Ostrow of Kopelowitz Ostrow P.A. as Class Counsel;

¹ All capitalized terms herein shall have the same meaning as those defined in the Settlement Agreement and Releases, attached to the Memorandum in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement as Exhibit A.

(5) approve the Notice Program and Notices and direct that Notice be sent to the Settlement Class pursuant to the Notice Program and Fed. R. Civ. P. 23(e)(1);

(6) approve the Claim process and Claim Form;

(7) order the Agreement's opt-out and objection procedures;

(8) appoint Kroll, LLC as Settlement Administrator and directing Kroll to carry out the duties and responsibilities of the Settlement Administrator specified in the Settlement;

(9) stay all deadlines in the Action pending Final Approval of the Settlement;

(10) enjoin and bar all members of the Settlement Class from continuing in any litigation or asserting any claims against Sovos and the Released Parties arising out of, relating to, or in connection with the Released Claims prior to the Court's decision to grant Final Approval of the Settlement; and

(11) set a date for the Final Approval Hearing. Plaintiffs respectfully request the Final Approval Hearing be set for the week of May 20, 2024, or a date as soon thereafter when the Court is available.

Defendant does not oppose this Motion. This Motion is based on the accompanying Memorandum; the Agreement and exhibits thereto; the Joint Declaration of Class Counsel Mason Barney and Jeff Ostrow filed herewith; the argument of counsel; all papers and records on file in this matter; and such other matters as the Court may consider.

Dated: December 8, 2023

Respectfully submitted,

/s/ Jeff Ostrow

Jeff Ostrow (Pro hac vice)

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CERTIFICATE OF SERVICE

I hereby certify that on this the 8th day of December, 2023, a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system.

/s/ Jeff Ostrow